

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 08-CR-50013
)	
ROBERT S. JOHNSON,)	
)	
Defendant.)	

MOTION TO EXPAND BOND TERRITORY

NOW COMES the defendant, ROBERT S. JOHNSON, by his attorney, RANDY WILT, and moves this Court to expand the geographic limitations of bond to permit travel into the State of Wisconsin for court purposes. In support hereof, it is stated as follows:

1. That in addition to the above-captioned matter, Defendant also has pending a criminal case in Crawford County, Wisconsin (Prairie du Chien), *State of Wisconsin v. Robert S. Johnson*, 08-FD-44.
2. Trial in the Wisconsin matter is scheduled to begin September 5, 2008, at 9:00 a.m. (See attached letter from Attorney Mark A. Peterson.)
3. Defendants needs permission to travel to Prairie du Chien, Crawford County, Wisconsin, for court purposes including trial, pretrial preparation, and court appearances. His failure to appear could result in the issuance of a warrant and possibly trial proceedings in his absence.

WHEREFORE, the defendant, ROBERT S. JOHNSON, prays this Court grant him permission to travel to Prairie du Chien, Crawford County, Wisconsin, for court purposes.

ROBERT S. JOHNSON, Defendant,

By _____ S/
RANDY WILT, Attorney for Defendant.

Prepared by:
RANDY WILT #3127828
SREENAN & CAIN, P.C.
321 West State Street, Suite 700
Rockford, IL 61101
(815) 962-5490

LAW OFFICES OF
PETERSON, ANTOINE & PETERSON, S.C.

C. H. PETERSON (1882-1969)
F. J. ANTOINE (1910-1997)
LEARN E. PETERSON
MARK A. PETERSON
THOMAS F. PETERSON

110 EAST HAYDN STREET
P.O. BOX 430
PRAIRIE DU CHIEN, WISCONSIN 53821
PHONE NO. 808-326-8458
FAX NO. 808-326-8070

June 20, 2008

Mr. Robert S. Johnson
P.O. Box 1401
San Marcos, TX 78667-1401

Re: State of Wisconsin vs. Robert S. Johnson
Case No. 08-FO-44

Dear Robert:

Please be advised that the above matter has been set for Trial on **Friday, September 5, 2008 at 9:00 A.M.** at the Crawford County Courthouse in Prairie du Chien, Wisconsin. Please give me a call to confirm receipt of this correspondence.

Sincerely,

PETERSON, ANTOINE & PETERSON, S.C.

By:


Mark A. Peterson

MAP:pjz